

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 99-271

COMMENTS BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.,
REGARDING KPMG'S EXCEPTION NO. 2

KPMG Exception No. 2: KPMG observed that the RETAS Student Users Guide instructions for creating trouble [sic] does not provide complete definition of the information required for certain trouble reporting activities. The Guide does not provide detailed information to create a trouble ticket for certain types of services – UNE-Loops (Issue 2.1); IOF circuits (Issue 2.2.); and DS1 loops (Issue 2.3).

Domain: Maintenance & Repair

KPMG Assessment: KPMG has concluded that “incomplete or incorrect information in the RETAS User Guide adversely affects CLEC operations when reporting troubles for certain service classes.”

Date of Exception: February 1, 2000

Date of BA Response: February 8, 2000

Date of AT&T Comments: February 18, 2000

AT&T Comments:

AT&T does not utilize the RETAS for entering trouble reports for UNE Loops, IOF circuits or DS1 Loops. To date, AT&T has found it to be more efficient to have customer trouble managed through on-line discussions with Bell Atlantic service center personnel. In this way, unlike through RETAS, AT&T is assured that the ticket is appropriately opened and that the issue is in the hands of a Bell Atlantic service representative. However, AT&T will not be able to use this approach as customer volumes increase. As AT&T becomes more established in the local services market and has secured a loyal customer base for local services, AT&T will once again attempt to use the RETAS for the opening of trouble tickets.

Bell Atlantic's response to the KPMG exception, *i.e.*, that it will modify the sections of the new RETAS Student User Guide pertaining to the trouble tickets, is inadequate. AT&T notes that: (i) the RETAS is not a new system for entering trouble tickets; (ii)

CLECs have been opening trouble tickets since the first installation for local services; (iii) BA has made promises, at other times, to modify the RETAS Student Guide; and (iv) BA has a similar process for the opening of trouble tickets for its retail operations. Yet, the issues with RETAS remain. AT&T, for example, has had manage the trouble ticket process manually to ensure that a customer trouble is addressed in a timely manner. To ensure that a trouble report is processed and gets the immediate attention of BA personnel, AT&T has had to open troubles through BA's service centers.

AT&T recommends the following:

- (a) KPMG should keep this exception open until such time that Bell Atlantic has provided training for the modified Student User Guide;
- (b) KPMG should then re-inspect the opening of trouble tickets for these classes of service to determine the effectiveness of Bell Atlantic's modifications to its Student Users Guide;
- (c) KPMG, further, should assess the performance of Bell Atlantic, using the Maintenance and Repair performance standards, *e.g.*, **Average Response Time – Create Trouble** and **Average Response Time – Status Trouble**.

The CLECs and Bell Atlantic's management of trouble tickets is directly linked to the accuracy of Bell Atlantic's documentation. Poor documentation leads to poor process management. The end result is poor customer satisfaction for CLECs. As KPMG has stated, if the opening of trouble tickets is not efficiently handled, CLECs would be adversely affected.